

# EXHIBIT **D**

Li ana Gal anti Deposi ti on Rought Transcript

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2 IN THE UNITED STATES DI STRI CT COURT

3 FOR THE SOUTHERN DI STRI CT OF NEW YORK

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5 CENTAURO LI QUI D OPPORTUNI TI ES MASTER  
6 FUND, L. P. ,

7 Pl ai nti ff,

8 -against- Civil Acti on No.  
15-cv-9003(LTS)(SN)

9 ALESSANDRO BAZZONI , CINQUE TERRE  
10 FINANCI AL GROUP, LTD. , CT ENERGIA LTD. ,  
and CT ENERGIA LTD. d/b/a ELEMENTO LTD. ,

11 Defendants.

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14 Videotaped oral deposition of LIANA  
15 GALANTI (Appearing remotely), taken  
16 pursuant to notice, was held at the law  
17 offices of BOIES SCHILLER FLEXNER LLP,  
18 575 Lexington Avenue, New York,  
commencing June 5, 2018, 8:17 a.m. , on  
the above date, before Leslie Fagin, a  
Court Reporter and Notary Public in the  
State of New York.

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23 MAGNA LEGAL SERVICES  
320 West 37th Street, 12th Floor  
24 New York, New York 10018  
(866) 624-6221

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2 APPEARANCES:

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4 BOIES SCHILLER FLEXNER LLP  
Attorneys for Plaintiff

5 575 Lexington Avenue  
New York, New York 10022

6 BY: BYRON D.M. PACHECO, ESQUIRE  
7 DAVID PAUL GEORGE BARI LLARI ,  
ESQUIRE

8

9 SULLIVAN & WORCHESTER LLP  
Attorneys for Defendant CT Energia Ltd. d/b/a  
Elemento Ltd. and Witness

10 1633 Broadway, 32nd Floor  
New York, New York 10019

11 BY: MICHAEL THOMAS SULLIVAN, ESQUIRE  
12 CLARK ANDREW FREEMAN, ESQUIRE

13

14 TACOPINA, SEIGEL & TURANO, P.C.  
Attorneys for Defendants CT Alessandro  
Bazzoni and CT Energia Ltd.

15 275 Madison Avenue, Fl. 35  
New York, New York 10016

16 BY: MATTHEW G. DeOREO, ESQUIRE

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18 ALSO PRESENT:

19 BRANDON POSTLEWATE, Videographer  
20 Magna Legal Services

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2 THE VIDEOGRAPHER: We are now on  
3 the record.

4 This begins videotape No. 1 in the  
5 deposition of Li ana Gal anti in the  
6 matter of Centauro Liquid Opportunities  
7 Master Fund, L.P. versus Alessandro

Li ana Gal anti Deposi ti on Rought Transcript

8 Bazzoni in the Civil Action No.  
9 15-cv-9003.

10 Today is Tuesday, June 5, 2018 and  
11 the time is 8:17 a.m.

12 This deposition is being taken at  
13 Boies Schiller Flexner LLP located in  
14 New York City, New York at the request  
15 of Boies Schiller Flexner.

16 The videographer is Brandon  
17 Postlewaitte of Magna Legal Services and  
18 the court reporter is Leslie Fagin of  
19 Magna Legal Services.

20 Will counsel and all parties  
21 present state their appearances and who  
22 they represent.

23 MR. PACHECO: My name is Byron  
24 Pacheco from Boies Schiller Flexner. I  
25 represent the plaintiffs.

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2 MR. BARI LLARI: My name is David  
3 Bari llari from Boies Schiller Flexner.  
4 I also represent the plaintiff.

5 MR. SULLIVAN: Mike Sullivan,  
6 Sullivan & Worchester representing  
7 Elemento and the witness.

8 MR. DeOREO: Matt DeOreo, from  
9 Tacopi na Seigel for CT BVI and  
10 Alessandro Bazzoni .

11 MR. FREEMAN: Clarke Freeman for

12           Li ana Gal anti Deposi ti on Rought Transcript  
13           Elemento Limited, also for the witness,

14           but will not be defending.

15           MR. PACHECO: Before the court  
16           reporter swears in the witness, all  
17           parties stipulate that the witness is  
18           appearing for the deposition remotely  
19           and that there will be no objection to  
20           being sworn in remotely, is that  
21           correct?

22           MR. SULLIVAN: Correct.

23           MR. DeOREO: Correct.

24           L I A N A   G A L A N T I, called as a  
25           witness, having been duly sworn  
             (Remotely) by a Notary Public, was

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1                       L. Gal anti  
2           examined and testified as follows:

3           EXAMINATION BY

4           MR. PACHECO:

5           Q.    Good morning, Ms. Gal anti .

6           A.    Good morning.

7           Q.    Can you hear me okay?

8           A.    It's a bit low. I need to focus.

9           Q.    I will do my best to speak as  
10           loudly as I can. My name is Byron Pacheco.  
11           As you heard, I'm an attorney for the  
12           plaintiffs in this case.

13                   Can you please state your full  
14           name, employer and business address for the  
15           record?

16           A.    Li ana Gal anti , and what do you

12           Li ana Gal anti Deposi ti on Rought Transcript  
of 2017?

13           A.    I'm not sure actually. It could  
14   be, but I'm not sure 100 percent.

15           Q.    Just one more question about your  
16   email. You mentioned that you were sometimes  
17   copied on emails that Mr. Dagastino is copied  
18   on, is that right?

19           A.    Sorry, say that again.

20           Q.    I'm just clarifying your testimony  
21   that you have been on emails that Mr.  
22   Dagastino is copied on, is that right?

23           A.    Yes.

24           Q.    Have you been on emails that Mr.  
25   Bazzoni is copied on?

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1                   L. Gal anti

2           A.    Yes.

3           Q.    Have you exchanged any direct  
4   emails with Mr. Bazzoni?

5           A.    No, never.

6           Q.    The only emails that you've been on  
7   that Mr. Bazzoni is on were where he was  
8   being copied, is that right?

9           A.    Correct.

10          Q.    Were the topics of those emails  
11   similar to the topics of the emails that Mr.  
12   Dagastino is copied on?

13          A.    Yes, generally, it's to approve  
14   payments. Occasionally, also, you know, for  
15   other trading, they get cc'd.

16          Q.    When you say, generally, to approve

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17 payments, what do you mean by, approve  
18 payments?  
19 A. They have ultimate say of payments  
20 and they need to sign for the payments.  
21 Q. What sorts of payments do you mean?  
22 A. Vendors, vendors' payments,  
23 consultancy payments.  
24 Q. The kinds of emails that you are  
25 describing are emails where someone is

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1 L. Gal anti  
2 seeking approval for payments and they are  
3 providing approval for payments, is that  
4 right?  
5 A. I don't understand, sorry.  
6 Q. Sorry, it was a confusing question,  
7 my apologies. Give me one second.  
8 A. Okay.  
9 Q. So a few minutes ago, you testified  
10 that the kinds of emails that you have seen  
11 Mr. Bazzoni and Mr. Dagastino copied on  
12 involve approval of payments and you said  
13 trading, is that right?  
14 A. Trading or training?  
15 Q. Trading, not training.  
16 A. Yes, business, general business,  
17 yes.  
18 Q. When you say, trading, what kind of  
19 trading are you referring to?  
20 A. I'm sorry, I don't know if I'm

21           Li ana Gal anti Deposi ti on Rought Transcript  
22           using the correct word. The general  
23           busi ness, the day-to-day busi ness that goes  
24           through, that's the only emails I see.  
25           Q. Are you copied on any emails  
involvi ng speci fic trading, as in energy

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1                           L. Gal anti  
2           trades?  
3           A. Only when there is an invoice  
4           involved.  
5           Q. So after the trade has already been  
6           completed or negotiated, you would be  
7           involved at the end, when there is an  
8           invoice?  
9           A. Yes.  
10          Q. Can you explain at what point  
11          during the trading process you would be  
12          copied on an email?  
13          A. I mean, if there is an advance  
14          payments to be made from the vendor, then  
15          they will probably email Mr. Rothenberg and  
16          myself to arrange for that payment and then  
17          when we make that payment, we will ask  
18          authorization to Mr. Francisco, so, yeah.  
19          Q. Is Mr. Bazzoni ever on any of those  
20          kinds of trading emails that you described?  
21          A. Sometimes I do see his name, yes.  
22          Q. You testified that you report to  
23          Mr. Rothenberg.  
24                  Do you report to anyone, other than  
25          Mr. Rothenberg?